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FEDERAL ELECTION  
COMMISSION  
MAR 4 1996

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ROBERT F. BAUER  
(202) 434-1602

March 1, 1996

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FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
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Lawrence M. Noble, Esq.  
General Counsel  
Federal Election Commission  
999 E Street, N.W. - Sixth Floor  
Washington, D.C. 20463

## Re: Complaint Against Michael Huckabee

Dear Mr. Noble:

The Democratic Senatorial Campaign Committee files this complaint charging violations of the Federal Election Campaign Act of 1971 ("FECA" or the "Act"), as amended, 2 U.S.C. §§ 431 et seq., and related regulations of the Federal Election Commission ("FEC" or the "Commission"), 11 C.F.R. §§ 100.1 et seq., by Michael Huckabee and his political campaign committee, Huckabee Election Committee.

Reports filed with the Commission contain substantial evidence that Huckabee and his committee unlawfully accepted political contributions from corporations in Arkansas and Tennessee. Specifically, reports filed by Huckabee and his committee show that on August 1, 1995, Huckabee and his committee accepted a \$500 contribution from "Fort Smith Coca Cola Bottling Co." Later that month, on August 22, 1995, Huckabee and his committee accepted a \$1,000 from "Delta Beverage Group Inc." of Memphis, Tennessee. Finally, in October 1995, Huckabee and his committee accepted a \$500 contribution from "Culp & Company Hudson, Cisne, Keeling."

Each of these contributions, if indeed drawn from a corporation, would be an obvious violation of federal law. The FECA forbids "any corporation whatever" to make a contribution in connection with a federal election. 2 U.S.C. § 441b(a). FEC regulations specifically prohibit candidates and their political committees from

[04005-0001/DA960610.027]

March 1, 1996  
Page 2

"knowingly accepting or receiving any contribution" from a corporation. 11 C.F.R. § 114.2(c). Furthermore, Commission regulations provide for a specific procedure to determine whether a questionable contribution is indeed a prohibited one made by a corporation. 11 C.F.R. § 103.3(b).

In this instance, there could have been no doubt on the part of Huckabee and his committee that the contributions in question were unlawful because they were unlawful on their face. Each of the three contributions in question bear some indicia in their name that the contributor was, in fact, a corporation. For example, Delta Beverage Group Inc. is clearly, on its face, a corporation. Similarly, Fort Smith Coca Cola Bottling Co. is obviously a corporate entity, prohibited from making contributions in connection with federal elections. Therefore, there can be little doubt that Huckabee and his committee knew that they were violating the law when they accepted the contributions in question.

Although the amount of the violation may not be large by relative standards, it is nevertheless important because it demonstrates a keen disregard for one of the Act's most important prohibitions. Furthermore, it is likely that if Mr. Huckabee is prepared to ignore or is ignorant of the prohibition against corporate contributions, he may very well violate other provisions of the FECA as well. In light of these violations of an important provision of the FECA, the undersigned asks the Commission to undertake an investigation into whether Huckabee and his committee have violated federal law, both in this instance, and potentially in others.

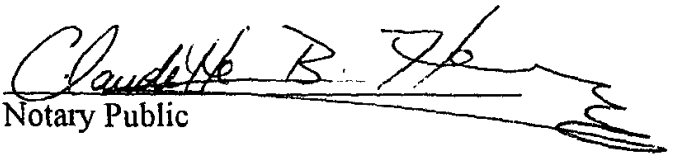
Respectfully submitted,

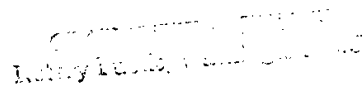


Robert F. Bauer  
Counsel to Democratic Senatorial  
Campaign Committee

March 1, 1996  
Page 3

SUBSCRIBED AND SWORN to before me this 1st day of March, 1996.

  
Notary Public



My Commission Expires:

My Commission Expires June 30, 1998

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